M E M O R A N D U M

FPA Region 5 Records Ctr.

DATE:

November 17, 1987

T0:

LPC - Division File

FROM:

P. M. McCarthy ()

SUBJECT:

1630450038 - St. Clair County - East St. Louis/Wastex

ILD980700744

RCRA - Enforcement

On November 6, 1987, R. Ballard and this writer conducted a Consent Decree inspection. We met with General Manager, Terry Hein, and Alvin Markle. The main purpose of this inspection was to determine if they had complied with the conditions which became effective ninety days after the July 31, 1987 signing of the Decree.

The two requirements which became effective on October 29, 1987 relate to container management. $\underline{A4}$ of the Consent Decree directs Wastex to properly close and seal all non-Chase inventory, and to arrange them two high and two wide. All drums, other than 299 of old Wastex inventory (in Bldg. 3/22), have been arranged properly. However, due to time contraints and lack of proper lighting, I could not determine if all drums were properly closed. This will be done at a later date.

According to Section B of the Consent Decree, the Chase inventory is to be reduced by one-fifth every ninety days. As of October 29, 1987, they were to have disposed of 743 drums. They have, as per Mr. Hein, only staged some Chase drums according to the categories of solid or liquid. Mr. Hein stated that they were surprised as to the number of drums which contain liquid. He said they have taken samples of these drums, but have not yet had them analyzed. Mr. Hein indicated that they may want to pump the liquids and blend them with their fuel.

On November 16, 1987, I called Mr. Hein concerning this matter. I informed him that, after my review of the Consent Decree, I could see no provision for them to do anything with the Chase inventory other than to solidify or incinerate the waste. He said he didn't read it that way, but they would not put any Chase waste into fuel stock until they get a ruling. I also asked how they were correlating the samples collected with the drums from which they were taken, since I had seen no markings on the drums. He said that "Alvin could tell" by the order in which they were collected. I strongly suggested that they assign a number to the drum and the sample jar at the time of sampling. He agreed to do this.

Also in Section A4, is the requirement that "no container containing ignitable or reactive waste shall be stored within 50 feet of the facilities property line...". The lines have been painted in the buildings, however, the drums in Building #3 are partially over the line.

 $\frac{A5}{1987}$. According to Mr. Hein, he expects to have this submitted the week of November 9th, 1987.

MUV 3 U 1987

IEPA/DLPC

STATE OF ILLINOIS

ENVIRONMENTAL PROTECTION AGENCY

INSPECTION REPORT

EPA Number: 1630450038

DECIEBA Number: TLD980700744

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1	Activity(By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	Un Annu Report 8 3	
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PRATECTION TO THE PROTECTION AGENCY USEPA Number: 1630450038 RECEIVED Number: TLD 980700744 Facility Name: Wastex Research Inc nFG : 1987 Street: 200 Braduna LEDA/DLPC City: East 5t Louis Telephone: 16/81-271-2272 State: Zip Code: County: ST. Clair 759 Regulated As: 9/7/7Type of Facility: Notified As: G, 90 Day Follow-up Required? yes LDF? yes no HPV? yes no Region: 6 Date of Inspection: 11-16-187 From: 10.00 to 11:30 Weather (LDF Only): //-Type of Inspection ISS: Sampling: Citizen Complaint: Closed: Record Review: Follow-up to Inspection of _____: Withdrawal: Other: X See memo dates Non Regulated Status 11/17/87 Small Quant. Gen:: Claimed Nonhandler: Other(Specify in narrative): Notified As/Regulated As Matrix Number: 104 Key Letter: Notification date, _____, from initial __ or subsequent __ notification. Part A date, from initial or amended Part A: Part B permit application submitted? yes ___ no __ Has the firm been referred to: USEPA? yes __ no __; IAG? yes __ no __; Count; Date of referral to USEPA: , States Attorney? yes ___ no __. IAG: _____, County States Attorney: _____ State Court Order Issued: Federal Court Order Issued: CACO)-USEPA : COMPLIANCE ORDER ISSUED: _ Illinois PCB Order Issued: (CAFO) - USEPA FINAL Order Issued: Completed by - PM McCarthy TSD Facility Activity Summary Exempt From Un Annual Regulation Report For VCETATEA(BA Closed On ACCIVITY Was Being Done at Process Code) Pt A Regulation Conducted Activity per 35 TAC, Section: Ever Time of Prior to Done

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